

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Laurie Ortolano,
Plaintiff,**

V.

**The City of Nashua, *et al.*,
Defendants.**

Civil Action No. 1:22-cv-00326-LM

DEFENDANT ATTORNEYS' PROPOSED VOIR DIRE

Defendant Attorneys Steve A. Bolton and Celia K. Leonard (“Defendant Attorneys”) respectfully request that its counsel be permitted to ask the following Voir Dire questions to prospective jurors:

JUROR'S BELIEFS ABOUT THE FIRST AMENDMENT

1. Do you believe that an individual who expresses their rights under the First Amendment is protected from consequences if that individual commits a crime?
2. Do you believe that the public has an absolute right to access non-public areas within a public building?

JUROR'S BELIEFS ABOUT ATTORNEYS

3. Do you believe that attorneys have an automatic animus towards opposing parties?
4. Do you believe that an attorney could be a victim of a crime?
5. Do you believe that attorneys are more or less likely to be truthful or untruthful than non-attorneys?

Respectfully submitted,

Steven A. Bolton and Celia K. Leonard,

By their Counsel,

UPTON & HATFIELD, LLP,

Date: March 20, 2025

/s/ Russell F. Hilliard
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day forwarded to all counsel of record through the Court's E-filing system.

/s/ Russell F. Hilliard
Russell F. Hilliard